

AO 91 (Rev. 01/09) Criminal Complaint

# UNITED STATES DISTRICT COURT

for the  
Western District of Tennessee

United States of America

v.

MONICA WILLIAMS

Case No. 2:12cr20021 MIP

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 2/9/2012 in the county of Shelby in the Western District of Tennessee, the defendant violated 18 U. S. C. § 924(c)  
an offense described as follows:

Carrying and use of a firearm during and in relation to a crime of a drug trafficking crime.

This criminal complaint is based on these facts:

See Affidavit.

☒ Continued on the attached sheet.

  
Complainant's signature

Kareem Jacox, SA, DEA  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10 Feb 2012

s/Charmiane G. Claxton

Judge's signature

City and state: Memphis, TN 38103

Charmiane G. Claxton, U.S. Magistrate Judge  
Printed name and title

## AFFIDAVIT

I, Kareem Jacox, first being duly sworn, do hereby state and affirm that:

I am a duly sworn Special Agent of the Drug Enforcement Administration (DEA) since March 2004. I am currently assigned to the DEA Memphis Resident Office, Memphis, TN. Prior to my employment with DEA, I was employed as a Memphis, TN Police Officer for approximately 6.5 years. In connection with my official DEA duties, I investigate criminal violations of state and federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846 and 848. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. I have testified in judicial proceedings and prosecutions for violations of controlled substance laws. I also have been involved in various types of electronic surveillance, and in the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances, and the laundering and concealing of proceeds from drug trafficking.

On February 9, 2012, Agents and Officers representing the Memphis Resident Office DEA Task Force executed a federal search at \_\_\_\_\_, Memphis, TN 38115. The federal search warrant was issued out of the Western District of Tennessee pursuant to an ongoing investigation being conducted by the DEA Memphis Resident Office.

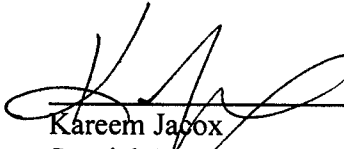
At approximately 8:15 a.m., agents and officers arrived at the target location. Upon arrival, agents and officers exited their transport vehicles and moved toward the primary entry point of the target location. The agents and officers were wearing body armor and markings that identified them as law enforcement officers. The agents and officers knocked and announced their presence prior to and upon making entry into the target location. Seconds after knocking and announcing our presence, a Memphis Police Officer drove his fully marked patrol vehicle onto the driveway of the target location and activated the lights and sirens. While making initial entry into the target location and announcing their presence, the agents and officers were greeted with gunfire from Monica Renice Williams (Defendant). The Defendant fired one shot at the officers and agents from inside the target location, from approximately ten (10) feet away with a .38 caliber handgun. At that time, agents and officers regressed to positions of cover, continued to announce their presence, and began to give orders to the shooter to exit the target location with hands in the air. After a period of no response, the Defendant did exit the target location with hands in the air. The Defendant was then taken into custody without further incident.

Group Supervisor Gabriel Bewley read Monica Williams her Miranda Warnings, which was witnessed by your affiant and Task Force Officer (TFO) Star Handley. Monica Williams said that she understood her Miranda Warnings and agreed to talk to agents. During the interview, Monica Williams stated that she thought that someone was forcing entry into her residence to harm her and removed her handgun from her nightstand and walked towards the rear door where agents and officers were making entry. Monica Williams said that she did not hear officers identifying themselves as police, nor did she hear or see the marked police unit in her driveway. When she observed the ram come through the door she fired a shot. Once she saw TFO Josh Leslie in identifiable police garments in the threshold of the doorway, she then retreated to her bedroom,

placed the handgun on her dresser, put on her night clothing, since she was nude and then complied with officers demands to exit the residence with her hands up. The Memphis Police Department Homicide Unit and Crime Scene Unit arrived at the residence to process the scene. The homicide unit transported Monica Williams to the homicide office for questioning. Agents and officers then commenced a search of the residence.

Your affiant and TFO Star Handley interviewed Monica Williams again at the homicide office. During the interview, Monica Williams stated that she had knowledge of the huge sum of US Currency that was located in her bedroom. She stated that the US Currency belonged to her boyfriend, Roger Chalmers. She also stated that the approximately 4 ounces of high grade marijuana belonged to her. Monica Williams said that she had recently started selling marijuana to make her some money, because the money that Roger Chalmers provided her was not enough to pay her bills. She further stated that she had no knowledge of the approximately 4 ounces of crack cocaine that was found in her residence.

Monica Renice Williams is in violation of, but not limited to, Title 18, United States Code, Section 924(c)- in that the Defendant during an in relation to a drug trafficking crime, specifically a violation of Title 21, United States Code, Section 841(a)(1), possession with intent to distribute marijuana, knowingly used and discharged a firearm, more specifically a .38 caliber handgun.

  
Kareem Jacob  
Special Agent  
U.S. Drug Enforcement Administration

Sworn to and subscribed before me this 10<sup>th</sup> the day of February, 2012.

**s/Charmiane G. Claxton**  
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Charmiane G. Claxton  
United States Magistrate Judge